

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN**

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**Case No.: 14-29485  
Judge: GMH  
Chapter: Chapter 13**

**In Re: Tresha Loretta Patton**

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**NOTICE AND REQUEST TO MODIFY CHAPTER 13 PLAN**

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Geraci Law, LLC, Attorneys for the Debtor, have filed papers with the court requesting modification of the Chapter 13 Plan in the above case.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to modify the plan as proposed, or if you want the court to consider your views on the request, on or before 21 days from the date of this notice, you or your attorney must:

File with the court a written request for hearing which shall contain a short and plain statement of the factual and legal basis for the objection. File your written request at:

Clerk, U.S. Bankruptcy Court  
517 E. Wisconsin Ave., Rm. 126  
Milwaukee, WI 53202

If you mail your request or response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also mail a copy to the parties listed below and on the attached mailing matrix:

Andrew Mark Golanowski  
Geraci Law, LLC  
2505 N. Mayfair Road, Suite 101  
Wauwatosa, WI 53226  
Phone: (414) 475-6052  
Fax: (877) 247-1960  
Email: [wal@geracilaw.com](mailto:wal@geracilaw.com)

United States Trustee  
Eastern District of Wisconsin  
517 East Wisconsin Avenue, Room 430  
Milwaukee, WI 53202

Mary B. Grossman  
Chapter 13 Trustee  
P.O. Box 510920  
Milwaukee, WI 53203

Geraci Law, LLC  
Andrew Mark Golanowski  
2505 N. Mayfair Rd. #101  
Wauwatosa, WI 53226

Tresha Loretta Patton  
  
6965 N 98th Street  
Milwaukee, WI 53224

If you or your attorney do not take these steps, the court may decide that you do not oppose the request and may enter an order modifying the Plan.

### **REQUEST TO MODIFY CHAPTER 13 PLAN**

1. The Proponent of this modification is the Debtor, through her Attorneys, Geraci Law, LLC.
2. This is a request to modify a Chapter 13 Plan (Select A. or B.):
  - A. \_\_\_\_\_ post-confirmation
  - B.   X   pre-confirmation (Select i. or ii.);
    - i. \_\_\_\_\_ Debtor Debtor's attorney certifies that the proposed modification does not materially or adversely affect creditors (Local Bankruptcy Rule 3015(b)); or
    - ii. \_\_\_\_\_ Debtor (s) attorney certifies that the proposed modification materially adversely affects only the following creditors and a copy of the proposed modification has been served on them (Local Bankruptcy Rule 3015(b)). The creditors are (See Attached List).
3. The Proponent wishes to modify the Chapter 13 Plan to do the following: See Below.
4. The reason for the modification is to provide for all claims.
5. Select A. or B.

- A. \_\_\_\_\_ The Chapter 13 Plan confirmed or last modified on \_\_\_\_\_ (date) is modified as follows: (State the specific language of the modification.)
- B.   X   The unconfirmed Chapter 13 Plan is modified as follows: the IRS priority claim of \$9,672.43 shall be paid in full through the Plan. Allowed general unsecured claims shall receive a pro rata share of not less than \$2,400.
- C. All remaining terms and provisions of the Plan are unaffected unless specifically addressed herein. In the event of a conflict between the original Plan and the modification set forth above, the latter shall supersede and control.

**6. BY SIGNING BELOW THE PROPONENT OF THE MODIFICATION CERTIFIES THAT, AFTER REVIEW OF THE MODIFICATION AND ALL OTHER TERMS AND PROVISIONS OF THE PLAN, THOSE REMAINING TERMS AND PROVISIONS OF THE PLAN ARE CONSISTENT WITH THE PROPOSED MODIFICATIONS.**

WHEREFORE, the Proponent requests that the Court approve the modification to the Chapter 13 Plan as stated herein.

Respectfully submitted and dated this Wednesday, November 19, 2014.

By: /s/ Andrew Mark Golanowski  
Andrew Mark Golanowski  
Attorney for Debtor  
Bar #: 1055499

Andrew Mark Golanowski  
Geraci Law, LLC  
2505 N. Mayfair Road, Suite 101  
Wauwatosa, WI 53226 Phone: (414) 475-6052 Fax: (877) 247-1960 Email: [wal@geracilaw.com](mailto:wal@geracilaw.com)

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**CERTIFICATE OF SERVICE**

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The undersigned, an Attorney, does hereby certify that a copy of this Certificate of Service and a copy of the attached Notice and Request to Modify Chapter 13 Plan were mailed First Class to the persons mentioned below, at their respective addresses, postage prepaid, by U.S. Mail in Milwaukee, WI on Wednesday, November 19, 2014:

Tresha Patton  
6965 N 98th Street  
Milwaukee, WI 53224

**SEE ATTACHED LIST**

Additionally, the documents referenced above were also served via electronic means on the following individuals on Wednesday, November 19, 2014:

United States Trustee  
Eastern District of Wisconsin  
517 E. Wisconsin Ave.  
Milwaukee, WI 53202

Mary B. Grossman  
Chapter 13 Trustee  
P.O. Box 510920  
Milwaukee, WI 53203

Dated this Wednesday, November 19, 2014.

By: /s/ Andrew Mark Golanowski  
Andrew Mark Golanowski  
Attorney of the Debtor  
Bar #: 1055499

Andrew Mark Golanowski  
Geraci Law, LLC  
2505 N. Mayfair Road, Suite 101  
Wauwatosa, WI 53226  
Phone: (414) 475-6052  
Fax: (877) 247-1960  
Email: [wal@geracilaw.com](mailto:wal@geracilaw.com)

Label Matrix for local noticing  
0757-2  
Case 14-29485-gmh  
Eastern District of Wisconsin  
Milwaukee  
Wed Nov 19 15:54:51 CST 2014

AT T  
C/O Franklin Collection SV  
2978 W Jackson St  
Tupelo,MS 38801-6731

(p)AMERICOLLECT INC  
PO BOX 2080  
MANITOWOC WI 54221-2080

City of Milwaukee  
Bankruptcy Dept.  
841 N. Broadway, Rm. 406  
Milwaukee,WI 53202-3613

DEPT OF EDU/OSLA SERVI  
Attn: Bankruptcy Dept.  
525 Central Park Dr Ste  
Oklahoma City,OK 73105-1723

Equifax  
Attn: Bankruptcy Dept.  
PO Box 740241  
Atlanta,GA 30374-0241

GMAC Mortgage  
Attn: Bankruptcy Dept.  
3451 Hammond Ave  
Waterloo,IA 50702-5300

Milwaukee County Circuit Court  
Bankruptcy Dept.  
901 N. 9th ST.  
Milwaukee,WI 53233-1425

Onemain  
Attn: Bankruptcy Dept.  
Po Box 499  
Hanover,MD 21076-0499

Rushmore LOAN MGMT SER  
Attn: Bankruptcy Dept.  
15480 Laguna Canyon Rd S  
Irvine,CA 92618-2132

Capital One Auto Finance  
c/o Ascension Capital Group  
P.O. Box 201347  
Arlington, TX 76006-1347

American Family Insurance  
Bankruptcy Department  
6000 American Parkway  
Madison,WI 53783-0001

Atlas Acquisitions LLC  
294 Union St.  
Hackensack, NJ 07601-4303

Concordia University  
Bankruptcy Dept.  
12800 N. Lakeshore Dr.  
Mequon,WI 53097-2418

Dynacare Laboratories  
Bankruptcy Dept.  
9200 W. Wisconsin Ave.  
Milwaukee,WI 53226-3522

Experian  
Attn: Bankruptcy Dept.  
PO Box 2002  
Allen,TX 75013-2002

IRS Priority Debt  
Bankruptcy Dept.  
PO Box 7346  
Philadelphia,PA 19101-7346

OSLA on behalf of  
US Dept of Education Direct Loans  
P. O. Box 18475  
Oklahoma City, OK 73154-0475

QVC  
Bankruptcy Dept  
303 Miller St  
Dept. 05  
Strasburg,PA 17579-1000

State Collection Servi  
Attn: Bankruptcy Dept.  
2509 S Stoughton Rd  
Madison,WI 53716-3314

DJL Mortgages Capital, Inc. c/o Rushmore loa  
1414 Underwood Ave, Suite 403  
Wauwatosa, WI 53213-2653

American InfoSource LP as agent for  
T Mobile/T-Mobile USA Inc  
PO Box 248848  
Oklahoma City, OK 73124-8848

Capital ONE AUTO Finan  
Attn: Bankruptcy Dept.  
3901 Dallas Pkwy  
Plano,TX 75093-7864

Credit Collection Services  
Bankruptcy Dept.  
Two Wells Ave., Dept. 7249  
Newton,MA 02459-3225

EOS CCA  
Bankruptcy Dept.  
700 Longwater Drive  
Norwell,MA 02061-1624

First Rate Financial  
Attn: Bankruptcy Dept.  
8072 North 76th Street  
Milwaukee,WI 53223-3202

MILWAUKEE WATER WORKS  
200 E WELLS ST  
RM 800  
MILWAUKEE WI 53202-3515

Office of the U. S. Trustee  
517 East Wisconsin Ave.  
Room 430  
Milwaukee, WI 53202-4510

Rnb-Fields3  
Attn: Bankruptcy Dept.  
Po Box 9475  
Minneapolis,MN 55440-9475

(p)STUDENT LOAN FINANCE CORPORATION  
ATTN BANKRUPTCY  
124 SOUTH FIRST STREET  
ABERDEEN SD 57401-4107

Transunion  
Attn: Bankruptcy Dept.  
PO Box 1000  
Chester,PA 19016-1000

We Energies  
Attn Bankruptcy Dept. RM A130  
333 W Everett St  
Milwaukee WI 53290-0002

Wisconsin Bell, Inc.  
c/o AT&T Services, Inc.  
Karen A. Cavagnaro-Lead Paralegal  
One AT&T Way, Room 3A104  
Bedminster, NJ 07921-2693

Wisconsin Electric POW  
Attn: Bankruptcy Dept.  
231 W Michigan St # A130  
Milwaukee,WI 53203-2918

Ann R. Kramer  
Geraci Law L.L.C.  
55 E. Monroe St. Suite #3400  
Chicago, IL 60603-5920

Mary B. Grossman  
Chapter 13 Trustee  
P.O. Box 510920  
Milwaukee, WI 53203-0161